IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. LI SHAOMING, et al., Defendants.	Criminal No. 4:13-cr-147 **DEFENDANT MO YUN'S JOINDER IN MO HAILONG'S MOTION TO COMPEL PRODUCTION**

Defendant Mo Yun, by and through her counsel of record, hereby joins defendant Mo Hailong's Motion to Compel Production of Discovery and Inspection (Clerk's No. 153) in all respects save his request regarding discovery deadlines and a discovery cutoff date, which matters are addressed below. With respect to the substantive requests for a motion to compel production, Ms. Mo adds the following clarifications to her joinder: First, to the extent Mr. Mo's motion seeks production of his own statements (¶¶ 1a. and 1b.), Ms. Mo substitutes a request for her statements. Second, to Mr. Mo's request for discovery of statements by his alleged co-conspirators (¶ 1c.), Ms. Mo would add statements by Mr. Mo. Mo Yun seeks production of these categories of documents pursuant to the same authorities cited by Mo Hailong in the relevant paragraphs of his Motion.

With respect to setting dates for a discovery cutoff, pretrial motions, and other matters, counsel for Ms. Mo have engaged in telephonic meet and confer sessions with AUSA Jason Griess. The parties have agreed to continue those discussions in hopes of reaching a mutually agreeable proposed schedule by the January 7, 2015, deadline set by this Court.

Defendant Mo Yun respectfully disagrees with Defendant Mo Hailong's proposed discovery cutoff date, however, and will seek a more definite and significantly earlier date by which the Government must produce all Rule 16, *Brady*, and *Giglio* materials, as well as any materials it has previously been ordered to produce. Counsel will continue to work towards a consensus date with all parties, but if no consensus can be reached Mo Yun will seek an order for such a cutoff date through the Court.[1] Additional discovery disputes, if any, could then be litigated without unduly impinging on Ms. Mo's intention to file certain pretrial motions expeditiously.

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[1] Ms. Mo recognizes that the Court has now set a September 14, 2015 trial date, and made certain findings with regard to the defendants' speedy trial rights, including that any delay between her requested May 2015 trial date and September 14, 2015 is excludable as "reasonable…for a defendant who is joined for trial with a codefendant whose time for speedy trial has not elapsed, and no motion for severance has been granted." (Clerk's No. 158). It is Defendant Mo Yun's intention to expedite as is reasonably possible an early discovery cutoff date and resolution of her evidentiary and pretrial motions. It is noted that Defendant Mo Yun has not waived and will continue to assert her rights under the Speedy Trial Act.

DATED: December 24, 2014

Respectfully submitted,

BIRD, MARELLA, BOXER, WOLPERT, NESSIM, DROOKS, LINCENBERG & RHOW, P.C.

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ATTORNEYS FOR DEFENDANT MO YUN

CERTIFICATE OF SERVICE

I hereby certify that on December 24, 2014, I electronically filed the foregoing with the Clerk of Court using the CM EFC system. I hereby certify that a copy of this document was served on the parties or attorneys of record and the United States Probation Officer by ECF/Electronic filing.

Executed on December 24, 2014, at Los Angeles, California.

/s/ Alicia Eastman

Alicia Eastman
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